

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,  
D.P., A.F., C.A., R.K., K.P.,  
and T.H.,

Plaintiffs,

v.

RED ROOF INNS, INC.,  
et al.,

Defendants.

JANE DOE 1-4,

Plaintiffs,

v.

RED ROOF INNS, INC.,  
et al.,

Defendants.

**PL Sum. J.****Ex. 001**

CIVIL ACTION NO.:  
1:20-CV-05263-MHC

CIVIL ACTION NO.:  
1:21-CV-04278-WMR

Deposition of:

Taken on Behalf of the Defendant  
June 9, 2022  
Volume 1

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Also present: Angie Poplin, Videographer

## A P P E A R A N C E S:

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Also present: Angie Poplin, Videographer

1 A. No.

2 Q. -- the sex industry?

3 A. No.

4 Q. Okay. Now you filed a lawsuit alleging  
5 that you were trafficked at the Red Roof hotel located  
6 at 2200 Corporate Plaza, Smyrna, Georgia, from around  
7 2011 to 2016. Do you understand that?

8 A. We corrected it. I have severe like brain  
9 damage from being beaten and tortured, so it's more  
10 like the end of 2012, the beginning of 2013 to 2017.

11 Q. Okay. So, well, let me -- we'll get to  
12 that in a minute.

13 A. Okay.

14 Q. But that's the allegation in the complaint,  
15 the second amended complaint that you filed, alleges  
16 from 2011 to 2016, you were trafficked.

17 Just listen to this part, okay? At the Red  
18 Roof Inn in Smyrna at 2200 Corporate Plaza, Smyrna,  
19 Georgia?

20 A. Yes.

21 Q. Do you understand that that's the lawsuit  
22 you filed?

23 A. Yes.

24 Q. Okay. In that same lawsuit, you alleged  
25 that you were trafficked at a Red Roof Inn hotel

1 located at 1960 North Druid Hills Road, NE, Atlanta,  
2 Georgia, during that same time? Do you understand  
3 that?

4 A. Yes.

5 Q. Okay. That lawsuit specifically alleges  
6 that you were a victim of sex trafficking. Do you  
7 understand that?

8 A. Yes.

9 Q. Okay. What is sex trafficking to you?

10 A. To me, sex trafficking is being forced to  
11 do sexual favors in exchange for money or drugs or  
12 anything.

13 Q. In exchange for something?

14 A. Yes.

15 Q. Okay. Do you know what prostitution in  
16 Georgia is?

17 A. Yes.

18 Q. And what is that?

19 A. Having sex for money.

20 Q. Okay. How are they different to you?

21 A. Sex trafficking is -- I was forced. It was  
22 not my choice.

23 Q. I'm going to read you the definition, the  
24 legal definition of prostitution, and you tell me if  
25 this is what you understand it to be. Okay?

1 A. 32 years old.

2 Q. You just turned 32?

3 A. I did.

4 Q. Happy birthday.

5 A. Thank you.

6 Q. When did your -- to use your word, when did  
7 your trafficking start? What year?

8 A. I would say at the end of 2012, beginning  
9 of 2013.

10 Q. What -- how old were you then? 22?

11 A. 22, yes.

12 Q. Okay. So at no time, at no time do you  
13 allege that you were trafficked before the age of 22;  
14 is that right?

15 A. Correct.

16 Q. Okay. Do you remember the very first hotel  
17 that you claim to have been trafficked at?

18 A. No.

19 Q. Okay. Do you remember when in 2012 or 2013  
20 you were first trafficked?

21 A. It was right around New Year's, I believe.  
22 I was drugged and tied to a bed, so I don't really  
23 have that much recollection.

24 Q. So when you say the end of 2012, you mean  
25 December?

1 A. No. That's not right. I'm sorry.

2 Q. Tell you what, don't worry about that right  
3 now. We'll go through the timeline in a minute.

4 A. Okay. Thank you.

5 Q. Let's go back to Pat.

6 A. Okay.

7 Q. All right. So when did you meet Pat?

8 Well, let me ask you this. Was Pat the first lawyer  
9 you met?

10 A. No. I met with some other lawyers. I just  
11 didn't -- I wasn't -- I just didn't feel -- it just  
12 didn't fit. I just didn't feel comfortable with them.

13 Q. And that was through Susan, met with the  
14 lawyers through Susan?

15 A. Yes.

16 Q. Do you remember their names?

17 A. Jerry Smith and Lloyd Hoffspiegel.

18 Q. Hoffspiegel?

19 A. Yeah.

20 Q. Okay. So when did you meet Pat?

21 A. About three, almost four years ago.

22 Q. Okay. And so you met Susan either at the  
23 end of 2016 or the beginning of 2017?

24 A. The beginning of 2017.

25 Q. The beginning of 2017, all right.

1 A. I was with Crum all the way up until I met  
2 with Susan.

3 Q. Do you remember when in 2017 you met Susan?

4 A. Just at the beginning. It was really at  
5 the beginning. January/February.

6 Q. Okay. So --

7 A. January. It was January.

8 Q. Okay, all right. Very good. So your  
9 trafficking ends in January 2017?

10 A. The day -- two days after I met with Susan,  
11 well, approximately two days after I met with Susan,  
12 my parents came and picked me up, and I was out of it  
13 for good.

14 Q. Do you -- so [REDACTED] gives you Susan's name?

15 A. Uh-huh.

16 Q. Right?

17 A. Yes.

18 Q. You're living with Crum in a townhome in  
19 Gwinnett County?

20 A. Yes.

21 Q. Duluth you said?

22 A. No, Gwinnett.

23 Q. Do you remember what part of Gwinnett?

24 A. Lawrenceville.

25 Q. Okay.



1 Q. Okay. When we take a break or maybe  
2 tonight, I can get those. Well, what about [REDACTED] e  
3 [REDACTED]?

4 MR. ALLUSHI: I don't think we have it  
5 either.

6 MR. KEITH: I don't know that I know that  
7 name either.

8 BY MR. KEITH:

9 Q. Who was she with?

10 A. [REDACTED] worked with PIVIP. [REDACTED], [REDACTED],  
11 [REDACTED], [REDACTED], [REDACTED], we all worked with PIVIP.

12 Q. Okay. Do you have contact info for [REDACTED]?

13 A. No.

14 Q. How did you reach out to her then?

15 A. I think it was -- I don't have Facebook  
16 anymore. I deactivated it. It was through Facebook.

17 Q. When did you deactivate Facebook?

18 A. I did it a while ago. I had traffickers  
19 try to reach out to me, so I deactivated it.

20 Q. Do you remember when?

21 A. No. My messenger is still active.

22 Q. So you could messenger her?

23 A. I can try. I haven't really reached out to  
24 her in a while.

25 Q. But you could give me her screen name?

1 A. No.

2 Q. Well, those guys are actually out there  
3 doing it, aren't they?

4 A. Yes. But I also have children, and I have  
5 a family that I don't want killed.

6 Q. But if your goal, if your goal really is to  
7 make sure it doesn't happen to other people --

8 A. But do you understand how many people these  
9 people know? I don't know all the people that they  
10 know. I was under surveillance. I had traffic.

11 I had clients that were not just  
12 traffickers but other pimps coming in. Well, it's the  
13 same thing, but pimps coming in. We didn't know who  
14 was who.

15 We didn't know who was a client. We didn't  
16 know who was a pimp. We didn't know who was there  
17 just to see our loyalty, if we would say anything.

18 Because if we talked, we'd get beaten.  
19 I've been tortured. I've been mutilated for hours.  
20 I've been raped.

21 Q. Did you ever go to the police?

22 A. No.

23 Q. Did you ever go to the FBI?

24 A. No.

25 Q. Did you ever go to any type of law

1 enforcement about any of these -- and there's about a  
2 dozen men that you claim to have trafficked you.

3 Did you ever go to any law enforcement,  
4 federal, state, local, city, and say I'm being  
5 trafficked, help me?

6 MR. BAUMRIND: Objection.

7 THE WITNESS: No.

8 BY MR. KEITH:

9 Q. Did you ever report any of these men to law  
10 enforcement?

11 A. No.

12 Q. Now I understand the threat that you've  
13 talked about that you fear. But don't you think that  
14 the men who are doing this, who are actually out there  
15 doing it, don't you think they deserve to be held  
16 responsible too?

17 A. I think they both deserve to be held  
18 responsible. But like I said, I was mutilated. I've  
19 had half of my clit cut off because I talked, so I  
20 learned to keep my mouth shut.

21 Q. A trafficker did that?

22 A. Yes, in a hotel.

23 Q. But the hotel people didn't do that?

24 A. They didn't say anything. They kept their  
25 mouths shut.

1 Q. So you knew [REDACTED] pretty well?

2 A. Yes.

3 Q. Are you still in touch with [REDACTED]?

4 A. Not -- we don't talk. I mean, we're not  
5 like friends like we used to. I mean, I tell her  
6 happy birthday, but that's about it.

7 Q. Was she trafficked with you?

8 A. Yes.

9 Q. By who?

10 A. Kwan and CB and [REDACTED]. And I  
11 don't know who all she was with after that.

12 (A discussion was had off the record).

13 (Exhibit No. JD1 4 was marked for  
14 identification).

15 BY MR. KEITH:

16 Q. All right. I'm showing you what I've  
17 marked as Exhibit 4. This is a copy of the paperwork  
18 regarding the theft of that iPhone.

19 The charges state that on July 20th, 2011,  
20 you did unlawfully take the property of [REDACTED],  
21 to wit: an iPhone, blah blah blah, and that's the  
22 first arrest you can recall?

23 A. Where [REDACTED] stole the iPhone, yes.

24 Q. Okay. And you pled guilty; right?

25 A. Correct.

1 prescription stuff, you would use opium?

2 A. Yes.

3 Q. Heroin. Okay. So you get this -- how long  
4 did this ordeal last?

5 A. I don't know. I know it was days.

6 Q. And then what happened?

7 A. I had some -- there was a gentleman who  
8 came in pretending that he was saving me, and I guess  
9 he really just bought me.

10 And I was forced to have sex with him, and  
11 I was instructed that I was going to be making money  
12 for them. And just the first gentleman that came in  
13 was the guy who owned the car, and I told him what  
14 happened, and he agreed to take me, and I left with  
15 him.

16 Q. John Phillip Harris?

17 A. Yes.

18 Q. Okay. Where were you downtown?

19 A. When?

20 Q. When you got picked up by this guy who  
21 kidnapped you.

22 A. It was either one of the parks, Centennial  
23 or Piedmont. I can't remember.

24 Q. Okay. So it's your testimony that you got  
25 into a car with some guy at either Centennial or

1 Piedmont to get a ride back home to North Fulton?

2 A. Correct.

3 Q. White guy or black guy?

4 A. A white guy.

5 Q. How old?

6 A. Wait, I'm sorry. The gentleman who picked  
7 me up for the ride was black. I don't know how old he  
8 was. He was older.

9 Q. Okay. By this time, you said you were  
10 regularly using opioids or heroin; right?

11 A. Correct.

12 Q. Were you looking for drugs down there?

13 A. No.

14 Q. What were you all doing?

15 A. I don't even -- we used to go to car shows.  
16 Jake owned an SS Trailblazer, so we used to go look at  
17 cars.

18 Q. And what was the fight about?

19 A. I cannot remember.

20 Q. So you get into a car with a guy you don't  
21 know who then, if I've got this right, takes you  
22 towards North Fulton. You freak out.

23 He starts beating the hell out of you, and  
24 the next thing you know you're getting dosed with  
25 heroin and gang raped?

1 every 60 days or monthly. I'm not positive.

2 Q. That's for pure cessation; right? To stop  
3 you; right?

4 A. Not sensation. It's just --

5 Q. Cessation.

6 A. Yes, correct.

7 Q. All right. So tell me about -- tell me  
8 about the getting out of that.

9 A. The gentleman, there was a gentleman who  
10 claimed he was saving me. And he -- I had to have sex  
11 with him. But he picked me up, and we went to a  
12 hotel. I had sex with him.

13 And he instructed me that I was going to be  
14 working for him. He just gave me the rundown of what  
15 all I would be doing, having sex for money or  
16 exchanging sexual favors for money.

17 Q. Okay. Now was this this John Phillip  
18 Harris guy?

19 A. That was my first john. That was the first  
20 date I ever did. Not willingly, but that was the  
21 first gentleman that showed up to my room.

22 Q. So you were -- the guy who picked you up,  
23 this was the first guy that you were -- the first  
24 client that you had while you were under the guy who  
25 picked you up from the black guy who got you at the

1 of Harris, the older gentleman who --

2 A. That was the guy.

3 Q. Okay, okay. And you don't know what hotel  
4 that was at?

5 A. He was staying at the Atlanta Hotel on  
6 Holcomb Bridge, but that was not where I was at with  
7 him.

8 Q. Where did you have sex with him? You said  
9 you had sex with the old man.

10 A. In a storage unit.

11 Q. Okay. So you didn't have sex with him at a  
12 hotel?

13 A. No.

14 Q. Okay, all right. So now you're with CB;  
15 right?

16 A. Yes.

17 Q. Where did he pick you up?

18 A. I was downtown. I had gotten downtown.

19 Q. Were you with the buyer?

20 A. Yeah. I was going to score. And I think I  
21 was going to get drugs, and I'm pretty sure he knew.  
22 Everyone knew where to get heroin at that point in  
23 town.

24 Q. Where was that?

25 A. The west side of Atlanta, The Bluff.



1 circles?

2 A. No. I actually worked at Kohl's, and I  
3 didn't even know. Like I hadn't -- I didn't know when  
4 I was -- until I had been trafficked that [REDACTED] was  
5 my manager.

6 Q. Okay. But you said early on that you  
7 didn't know you were being trafficked. You said that  
8 earlier?

9 A. Correct.

10 Q. What did you think was going on?

11 A. Honestly, I did not know what to call it.  
12 I had no idea. I knew prostitution was involved, but  
13 I did not know.

14 I did not know at the time I was a victim.  
15 I didn't know. I knew I was going to be forced to do  
16 things against my will.

17 Q. When CB picks you up, did he tell you  
18 you're going to have sex for money? How did it turn  
19 out that you started working for him?

20 A. Well, CB is a gorilla pimp.

21 Q. What does that mean?

22 A. He was my main abuser. He was very brutal.  
23 He would rape us. He would beat us. He didn't care  
24 what he did to us. We did not matter to him.

25 Q. When you say gorilla, is that just because

1 of his violence? Is that what it means, or is because  
2 he's the king of --

3 A. No. That's what we call him because he's  
4 violent.

5 Q. Okay. I ask because that's a new term to  
6 me. So he is a gorilla pimp. Are there other types  
7 of pimps?

8 A. There are.

9 Q. What are the other types?

10 A. Just gorilla pimp is just known. Like  
11 those are the ones you just expect the worst.

12 Q. Because they beat you?

13 A. They're brutal. They're malicious. They  
14 don't care. They're really messed up. They rape you  
15 with power tools. They just don't care about you.

16 You're just an object. You're not a  
17 person. You have no soul, like you're just there.

18 Q. Did you have any other gorilla pimps?

19 A. (Witness nods head).

20 Q. Who?

21 A. Sorry.

22 Q. That's okay.

23 A. The majority of my pimps. [REDACTED],  
24 CB, Kwan, Bagz, Batchi, Crum. The majority of my  
25 pimps were -- I mean, they were all violent, but CB

1 took the cake.

2 Q. Okay. So let me read you a list. I went  
3 through --

4 A. I'm just saying. You asked me who the  
5 gorilla was.

6 Q. And I'm sticking with that. The list of  
7 folks that's in Exhibit 2, there are a number of,  
8 quote, quote, traffickers listed. But a lot of them  
9 say that they were associated or something like that.

10 The ones that I could pull out that you  
11 identified specifically as one of Jane Doe 1's  
12 traffickers are the following. Okay?

13 A. Okay.

14 Q. Bagz, Cashmere, Kwazi, Zeke, [REDACTED]

15 [REDACTED], [REDACTED], [REDACTED], [REDACTED]

16 [REDACTED], [REDACTED].

17 A. There's more.

18 Q. Well --

19 A. They're all listed in here.

20 Q. Those are the only ones that I saw that you  
21 listed as one of Jane Doe's traffickers.

22 A. No. I have them listed all right here.

23 Q. Well, let's go through them.

24 A. I've got Applehead, Bagz.

25 Q. Well, I've got Bagz.

1 T [REDACTED], [REDACTED].

2 Q. Okay. Talk to me about -- so was CB part  
3 of PIVIP?

4 A. Yes.

5 Q. Okay. So when getting in with -- when  
6 getting with CB is when you were introduced to this  
7 outfit?

8 A. PIVIP?

9 Q. Uh-huh.

10 A. Yeah.

11 Q. Tell me about what you know about them.

12 A. Kwan was in music, so we did a lot of like  
13 music shows. Like Kwan, CB, Bagz, Nitty, Fresh, Ant,  
14 they all grew up together, [REDACTED].

15 Like they started like this PIVIP group of  
16 Pimps In Very Important Places, and they all ran a  
17 bunch of girls. Like they all had us.

18 We were constantly traded, sold, lost in  
19 poker games like to each one. So you never knew where  
20 you were staying like or how long you were going to be  
21 with each man. You were just there.

22 PIVIP, they just pin you against each  
23 other. They want you -- they don't want any of the  
24 girls getting close because you have more of a chance  
25 of running off with each other. They're scum.

1 Q. So what -- slowly, because you talk a  
2 little fast. Slowly tell me all of the folks that you  
3 can remember who were in PIVIP.

4 A. CB, [REDACTED], Kwan, Nitty, Fresh,  
5 Bagz. The other ones were really just affiliates.  
6 Diablo, [REDACTED], they were affiliates.

7 Cliff was an affiliate. Sosa is an  
8 affiliate. Panama was an affiliate of them.

9 (Court reporter interrupted for clarity).

10 A. Batchi. Not Batchi. Am I able to look at  
11 these? I just wanted to make sure.

12 Q. It's not a memory test. I want to get --

13 A. Big E.

14 Q. Okay.

15 A. Black. Swazie was an affiliate. Zeke,  
16 Uncle Barry. That's it that I think we have.

17 Q. So is there -- in your mind, is there any  
18 clear delineation between once you got in with these  
19 PIVIP guys who was your pimp at any one time?

20 Is there a clear delineation in your head  
21 that you can tell me from this point in time I was  
22 with so and so, and after that I was with so and so?

23 Or was it, as you said, they were all  
24 together, and you were just with that group?

25 A. It was pretty much like, I mean, they would

1 make you -- there were a group of them, but one was  
2 like overseeing you or one owned you pretty much.

3 And then -- but it was never any -- like it  
4 could range like seriously. Like I've had a pimp for  
5 an hour before I was lost in a game and just sold.

6 It could last months. It could last days.  
7 It was really up to them.

8 Q. When you were with these guys, what did you  
9 call them? Did you call them by name? Did you call  
10 them pimp? Did you call them --

11 A. By the name that we were told to call them.

12 Q. And, I mean, did they give you -- I guess  
13 when you were talking to them, you called them by the  
14 name they told you to call them?

15 A. You never called them by their name.

16 Q. By their government name? By their legal  
17 name? You never called them that?

18 A. No, we didn't. I was lucky if we got their  
19 government names, but we don't -- we never. It's just  
20 yes, sir. No, sir.

21 Q. Okay. When you were talking about them to  
22 another person, what did you refer to them as?

23 A. My honest answer? The fuckers.

24 Q. Okay. That was just a generic term for  
25 them all?

1 Q. Well, that's very different than trying to  
2 keep what you were doing secret, what you just told me  
3 was a big part of it. Excuse me.

4 A. We got more comfortable at Red Roof.

5 Q. Hold on. You've got to wait. A part of  
6 being a prostitute is not flaunting you're a  
7 prostitute. That's what you basically said. You need  
8 to keep it secret?

9 MR. BAUMRIND: Objection.

10 THE WITNESS: I mean, you want to look  
11 attractive. You want to be appealing. So even  
12 if you're out, you can catch a date.

13 Like even walking to a vending machine, you  
14 want to be -- you want to look your best at all  
15 times, and that always meant looking like a slut.

16 BY MR. KEITH:

17 Q. Not looking like a beat-up person though;  
18 right?

19 MR. BAUMRIND: Objection.

20 THE WITNESS: I mean, it happens.

21 BY MR. KEITH:

22 Q. Well, let me ask you this. Let me ask you  
23 this. You said that there were black men with pinky  
24 rings that were dressed nice.

25 A. I mean, they wouldn't just look like that.

1 I mean...

2 Q. Well, that's what you said, and I'm going  
3 to try to figure out --

4 A. They'd wear Polos. They're just more  
5 clean-cut, not just like wearing -- I mean, of course,  
6 some of them had baggy pants, but it wasn't -- not all  
7 of them looked like thugs. Does that make sense?

8 A lot of them were more clean-cut. Like  
9 [REDACTED] was very clean-cut. [REDACTED]  
10 tried to be very clean-cut. Kwan was just a fat slob.

11 They all just tried to look nice. But, I  
12 mean, when you're on that -- in that life on the  
13 street, you know who's who by how they act and how  
14 they walk and the way they talk.

15 Q. So well-dressed black men, that should  
16 alert you to something?

17 MR. BAUMRIND: Objection.

18 THE WITNESS: No, not entirely. That's  
19 what I was just trying to explain to you. It  
20 wasn't just nice dress.

21 I mean, I'm explaining how they all looked.  
22 They all had different looks. But, I mean, at  
23 the hotels, the pimps that were definitely there,  
24 you knew they were -- I mean, we knew they were  
25 pimps.



1 I don't know how you couldn't. They'd sit  
2 there sometimes outside the room watching the  
3 rooms, watching us. They'd always be right  
4 around the corner.

5 BY MR. KEITH:

6 Q. Well, you knew they were pimps because you  
7 were in the lifestyle; right?

8 MR. BAUMRIND: Objection.

9 THE WITNESS: Correct.

10 BY MR. KEITH:

11 Q. But what you just described to me is  
12 well-dressed black men sitting outside a hotel room?

13 MR. BAUMRIND: Objection.

14 THE WITNESS: Correct.

15 BY MR. KEITH:

16 Q. So are well-dressed black men pimps, all of  
17 them?

18 A. I'm not trying to -- I'm just telling you  
19 what I saw at those hotels.

20 Q. Are all women who wear provocative clothing  
21 prostitutes?

22 A. I didn't say that.

23 Q. Okay. Well, what you're saying is that  
24 women who dress like, to use your words, sluts, and  
25 well-dressed black men walking around should have

1 Q. Did you get to keep any money?

2 A. No.

3 Q. How did you eat?

4 A. I might have gotten 50 cents to go to the  
5 vending machine, if they didn't provide food. I was  
6 starved a lot. I got down to 86.4 pounds.

7 Q. How tall are you?

8 A. 4' foot 11".

9 Q. Okay. Did you stomp on anybody's balls at  
10 the Red Roof Smyrna?

11 A. Yes.

12 Q. The Japanese guys or somebody else?

13 A. No, the Japanese guys.

14 Q. What about at the Druid Hills?

15 A. No.

16 Q. Did Bibbero, were you working for Bibbero  
17 out of Smyrna at all?

18 A. I worked with Bibbero in Miami, not in any  
19 of the Red Roof Inns. He was in the InterContinental  
20 at the Four Seasons.

21 Q. So he's high dollar?

22 A. Yes.

23 Q. I didn't see in our list that we went  
24 through, I didn't see any out-of-state stuff. So you  
25 traveled out of state?

1 down. Okay?

2 A. Okay.

3 Q. But tell me what it is that you think  
4 should have alerted them that you were involved in  
5 commercial sex?

6 A. The way we looked and dressed.

7 Q. So your dress?

8 A. Yes.

9 Q. Okay. What do you mean by looked? Was it  
10 the way you dressed?

11 A. I was extremely malnourished.

12 Q. Malnourished, okay.

13 A. Dressed...

14 Q. Provocatively?

15 A. Classy provocatively, yes.

16 Q. Classy as opposed to slutty provocative?

17 A. The goal was to be classy, not trashy.

18 Q. Right. So it was show a little bit, but  
19 don't show it all?

20 A. Yes.

21 Q. Got it.

22 (Mr. Keith shows the witness a picture).

23 Q. Like this?

24 A. Yes.

25 Q. Okay.

1 the door?

2 (A discussion was had off the record).

3 BY MR. KEITH:

4 Q. So we were at traffic?

5 A. The amount of condoms in our trash cans.

6 Q. And what's the amount? How many did you  
7 have?

8 A. Boxes.

9 Q. Boxes sitting out?

10 A. Well, we'd have them in the drawers put up,  
11 but there would be like used condoms in the trash  
12 because they clogged up the toilets, and we weren't  
13 allowed to flush them.

14 Q. How many is enough to alert folks that  
15 there's commercial sex activity? What's the number?

16 A. I mean, there's handfuls of condoms in the  
17 trash bags.

18 Q. Okay. So I'm asking you for a number.

19 A. Large amounts. Large amounts. Over 10.

20 Q. Okay. Next?

21 A. We would always get extra sheets and towels  
22 in case something got messed up or dirty.

23 Q. Well, that alone is not going to indicate  
24 anything, is it? I mean, I've got --

25 A. I mean, we're talking four, five, six extra

1 sheets up to eight extra towels. But the staff did  
2 not like that, so we'd have to constantly be going to  
3 like swapping them.

4 Q. Right. At the Red Room Smyrna, you had to  
5 return them?

6 A. Yes.

7 Q. So --

8 A. But they would also give extras.

9 Q. But you had to return them; right?

10 A. Correct.

11 Q. So it wasn't a situation where they'd walk  
12 in and see 20 towels?

13 A. No, no. They were very limited on how many  
14 you were to get. The same with the sheets.

15 Q. Right. So, I mean, I've got three kids.  
16 I'll tell you, I ask for extra towels all the time.

17 A. Right. But we didn't have children with  
18 us.

19 Q. Well, you had cats.

20 A. I had a litter box.

21 Q. Okay. So extra sheets, extra towels?

22 A. Yes.

23 Q. Anything else?

24 A. That's just my...

25 Q. Are you charged?

1 A. Yes.

2 Q. Okay.

3 A. Just give me a minute, please.

4 There would be loud noises. You could hear  
5 us. Some of the clients were very loud.

6 Q. So basically loud sex?

7 A. Sexual. That, or if we got into -- like  
8 sometimes we had very irate customers that would try  
9 to hurt us, so you would hear scuffles.

10 Q. So loud exchanges?

11 A. Yes.

12 Q. Okay.

13 A. You would hear people getting hit, and you  
14 could hear it. I mean...

15 Q. That's fine. I mean, if there's anything  
16 else, we can come back.

17 (Exhibit JD1 10 was marked for  
18 identification).

19 BY MR. KEITH:

20 Q. So I'll show you what we marked as 10,  
21 which you produced as some number, but it got cut off.  
22 Is that you?

23 A. And [REDACTED], yes.

24 Q. Okay. Is that you during the time period  
25 that you claim to have been trafficked?

1 Forrest?

2 A. Correct.

3 Q. And so make sure I've got this right.

4 Forrest was taking money from [REDACTED]?

5 A. Yes.

6 Q. Panama, Bagz, Fresh, Kwan, Gutta, CB,  
7 Traddle, and Black?

8 A. I know he was. I know he had exchanges  
9 with them. I can't say --

10 Q. Money or drugs?

11 A. I'm fairly positive, yes.

12 Q. Okay. So he was taking that to serve as a  
13 lookout?

14 A. Yes.

15 Q. And to serve as a conduit to send the  
16 owners to get paid or to pay you for sex?

17 A. Yes.

18 Q. Anything else that Forrest was doing?

19 A. I used to go -- like I used to have  
20 interaction with Forrest like all the time. I would  
21 go smoke a cigarette with him right outside the  
22 office.

23 Q. Smoke weed with him?

24 A. No. I've never smoked weed with Forrest.

25 Q. You ever smoke weed?

1           A.       Yeah, but not while I was working. I was  
2       on heroin and after crack.

3           Q.       Okay. So Forrest, if I'm hearing you  
4       right, Forrest was on the payroll?

5           A.       Yes.

6           Q.       He was actively involved in whatever was  
7       going on there? Whether he thought it was trafficking  
8       or just prostitution, he was actively involved?

9           A.       Yes, and the same with the owners.

10          Q.       Well, they were involved by being  
11       customer-type things; right?

12          A.       Right.

13          Q.       They weren't alerting you to the police  
14       coming?

15          A.       We knew when police were coming. I didn't  
16       always answer the hotel room phone, and Forrest was  
17       not always in the front office.

18          Q.       Well, as far as I could tell, the police  
19       were always out there.

20          A.       They sure were. They frequented that  
21       parking lot a lot.

22          Q.       And they couldn't stop the prostitution  
23       that was going on out there?

24          A.       Nope.

25          Q.       So even with police constantly in that



1 never a day where all five of us only had one  
2 person come and see us.

3 Q Would you take showers in between your  
4 dates?

5 A Every single time.

6 Q Did this occur in approximately how many  
7 hotels in Atlanta? Including ones that you have  
8 sued and ones that you haven't sued, how many?

9 A A lot. I mean, we've stayed at Hiltons,  
10 we've stayed at Doubletrees, we've stayed at Crowne  
11 Plazas. We've stayed at, you know, I mean,  
12 basically every hotel you could ever think of  
13 except for ones that were like maybe three, \$400 a  
14 night.

15 Q More than 20 hotels?

16 A Way more than 20 hotels.

17 Q More than 50 hotels?

18 A Probably about that, even including not in  
19 Atlanta, because I was trafficked with Kwan's  
20 associate, Black, in Greenville, South Carolina,  
21 so...

22 Q So if you're seeing about 15 people a day  
23 for a little over a year --

24 A Yeah, it's a lot of people.

25 Q It's about thousands of people?

1 THE VIDEOGRAPHER: The time is 6:15. We're  
2 back on the record.

3 BY MR. KEITH:

4 Q. Who did you tell me that was?

5 A. [REDACTED].

6 Q. Okay. So it was somebody -- well, just  
7 start over. Who at Druid Hills was involved?

8 A. Staff.

9 Q. And what did they do?

10 A. Alerted us. I'm pretty sure some of -- I  
11 can't remember if they had sexual favors, but I know  
12 they would call our rooms.

13 That one was really like the Red Light  
14 District. I mean, that's what I compare both of them  
15 to. But Druid Hills, do you want me to explain?

16 Q. Yeah.

17 A. Constantly cars coming in and out. There  
18 was a little gazebo that we used to smoke at across  
19 from the -- like in the parking lot. There was  
20 constant traffic of girls walking around, guys, drug  
21 deals, trafficking.

22 Q. As between the two Red Roofs, which one had  
23 the most traffic like you're describing?

24 A. Smyrna.

25 Q. As between all the hotels that you were at,

1 But he beat me for six and a half hours,  
2 and then he sodomized me. He raped me. He  
3 mutilated me. He raped me with power tools.

4 The next morning, [REDACTED] and  
5 [REDACTED] had to carry me out of the room  
6 into another room while he carried my stuff out  
7 to the car, because he said he was going to  
8 finish me off.

9 And they had locked me in a room with them  
10 and just barricaded the doors because he was  
11 looking for me. And my eyes were swollen shut,  
12 so I couldn't see. They had to carry me.

13 BY MR. KEITH:

14 Q. When did this happen?

15 A. I can't remember exactly.

16 Q. How long had you been with him when this  
17 happened?

18 A. On and off, several times.

19 Q. How did he manage to -- you said he cut  
20 part of your clitoris off?

21 A. He took a razor blade to me. He shoved a  
22 pillow over my face. His nephew was in the room with  
23 us filming it.

24 Q. Did he tell you why he did that?

25 A. He had done meth, and he was just paranoid

1 Q. When did you -- did you move to injection?

2 A. Yes.

3 Q. Based upon that thing with the IV?

4 A. Yes.

5 Q. Okay. Before you became involved in what  
6 we've talked about today from 2012 to '17 or '13,  
7 whatever -- you know what I'm talking about -- had you  
8 ever had sex in exchange for money or drugs or things  
9 of value?

10 A. Before my trafficking? No.

11 Q. When were you first trafficked, to use your  
12 terms, at the Red Roof Smyrna?

13 MR. BAUMRIND: Objection.

14 THE WITNESS: Oh, man, early on.

15 BY MR. KEITH:

16 Q. How early on?

17 A. Within that first year. We were at --  
18 those two hotels were the ones that we frequented  
19 monthly, if not weekly. Every month of every year, we  
20 were at that hotel.

21 Q. Okay.

22 A. One of those two.

23 Q. Well, and that's what I'm trying to --

24 A. If not both.

25 Q. How long were you staying?

1 A. I've stayed from a day to a month.

2 Q. Okay.

3 A. To a couple months.

4 Q. So now --

5 A. I stayed for over a month in the back  
6 building.

7 Q. When?

8 A. Over a period of time.

9 Q. Well, clearly over a period of a month.  
10 But when was this month-long stay?

11 A. I don't remember exactly when it was.

12 Q. Okay. Do you remember anything with any  
13 type of specificity that you can tell me about when  
14 you were at the Red Roof?

15 A. Every single year. Every single month.

16 Q. Well, I can say every single day, but I'm  
17 asking you with specificity.

18 A. No. I'm saying every month, if not weekly,  
19 we stayed at one of those hotels. We got a hotel room  
20 at one of those rooms, at one of those hotels, every  
21 single month of every year that I was trafficked.

22 Q. Okay. Every month is different than every  
23 week, so let me make --

24 A. It would range.

25 Q. Hold on. Hold on. So that I got this, it

1 is your claim that every single month of every single  
2 year that you claim you were trafficked you were at  
3 one of the two Red Roof hotels that you've sued?

4 A. If I was not locked up or a ward of state,  
5 yes, we were at one of those hotels.

6 Q. You were never locked up for a whole year,  
7 were you?

8 A. I don't remember how long.

9 Q. So, okay. Fair enough. The times that you  
10 were not incarcerated, setting aside those, it is your  
11 testimony that at least once a month for all the times  
12 that you were not incarcerated, you were at one of the  
13 two Red Roof hotels?

14 A. Yes.

15 Q. Do you believe that in the time that you  
16 were not incarcerated, that you were at both of the  
17 Red Roof hotels at least once a month during that  
18 time?

19 A. Yes.

20 Q. Were those the two most frequent hotels you  
21 went to?

22 A. Yes.

23 Q. But you were trafficked at at least 18  
24 other hotels?

25 A. Yes.

1 A. Not often. Very rarely. Very, very rare.

2 Q. How rare? Once a month?

3 A. No. Not even once a month.

4 Q. Okay. How many times did you have sex with  
5 20 men?

6 A. Weekly.

7 Q. Okay. What was the average on a daily  
8 basis?

9 A. Between six to 20 on average.

10 Q. That's a big difference.

11 A. It is. Every day was different.

12 Q. I understand that.

13 A. That's the average that I can give you.

14 Q. Well, that's a little -- between six and 20  
15 is, well, what, that's 14? So that's 13? That's an  
16 average?

17 A. Okay.

18 Q. Is that a fair number to say, if you were  
19 looking at an average?

20 A. No. You can't give an average. Every day  
21 was different. There's no way to give you -- like I  
22 can't. I'm sorry.

23 Q. Well, there's ways to do weighted averages.  
24 I mean, there's a way to come to the number.

25 I'm trying to figure out how many times --

1 Q. But not at the Red Roof?

2 A. No. They don't have a pool. Neither of  
3 them do. None of those four hotels have a pool.

4 Q. Were you beaten by a pimp at Smyrna?

5 A. I've been beaten at every hotel.

6 Q. Who beat you at Smyrna?

7 A. I've had [REDACTED] put his hands on me there.  
8 I've had [REDACTED]. I had Kwan. I had CB, Gutta,  
9 Panama, Batchi. All of them have put their hands on  
10 me.

11 Q. Did all that occur inside the rooms?

12 A. No.

13 Q. Okay.

14 A. It would be -- some of them would be in the  
15 parking lot in public.

16 Q. Okay. Tell me about the ones that -- I'm  
17 talking specifically at Red Roof Smyrna. Tell me who  
18 you call laying hands on you in public?

19 A. [REDACTED], Kwan --

20 Q. Okay. Let's slow down. Okay. When and  
21 what did [REDACTED] do?

22 A. I can't tell you when, but [REDACTED] has  
23 back-handed me and punched me in the face.

24 Q. Okay. Kwan?

25 A. Has done the same.



1 Q. Okay. Who else?

2 A. CB.

3 Q. What did he do?

4 A. He's beaten, raped, and tortured me,  
5 sodomized me.

6 Q. In public?

7 A. In public. He's beaten me in public.

8 Q. At the Red Roof?

9 A. He's hit me in the face, yeah, at the Red  
10 Roof, absolutely.

11 Q. Are these at night or at day?

12 A. Both.

13 Q. In front of employees or not?

14 A. I don't know who could have seen us and who  
15 couldn't have.

16 Q. Okay. I'm not trying to be impolite here.  
17 But when you say that any of these guys raped you,  
18 that clearly was inside of a room; right?

19 A. Yeah.

20 Q. No matter where it was?

21 A. In the room.

22 Q. Were you ever raped at the Smyrna?

23 A. Yes.

24 Q. By who?

25 A. All of my pimps.

1           A.       Yeah. But it was like, I think, like one  
2       or two days. It was not very long. Swazie and I did  
3       not mix well.

4           Q.       Swazie the pimp?

5           A.       Yeah. He also owned Follies. He had the  
6       whole third floor at the Microtel. He had that place  
7       on lockdown.

8           Q.       Okay. So...

9           A.       I can't -- there is a couple. I don't  
10      think Mardi Gras. I can't remember the other strip  
11      clubs I worked. There was just a few. I mostly just  
12      stayed in hotels.

13          Q.       What led you to dance?

14          A.       My pimp. And it was a break from having --  
15      it was just not having to have like sex as long  
16      because you could work. You could work at a strip  
17      club for like a couple hours and get like a little bit  
18      of a break.

19                    But, I mean, you don't ever really get a  
20      break. There's never a break. You don't ever...

21                    I would go days without sleeping because  
22      they would be giving me meth, not letting me sleep. I  
23      had pimps have me massaging their legs for hours at  
24      times, and I'd have to stand there falling asleep  
25      while standing up.

1 Q. They gave you meth? Is that what you said?

2 A. Yeah. They were mixing it in with our  
3 heroin and not telling us.

4 Q. Okay. Were you performing any commercial  
5 sex acts at the strip clubs?

6 A. By instruction under a pimp, yes.

7 Q. So in the back room, what would you do?

8 A. I mean, you're naked. Sometimes you can  
9 just sit on a dick real quick.

10 Q. And have sex?

11 A. Yeah.

12 Q. The pimps weren't there; right?

13 A. Yes, they were.

14 Q. In the room?

15 A. No. They were right outside the back room,  
16 or they're somewhere in the club watching the back  
17 room. They have people. They have watchers. They  
18 have spotters. All exchanges of money are seen in  
19 clubs.

20 Q. When did you learn the term "trafficking"?

21 A. With Susan Norris. Oh, no, no, no. That's  
22 not true. Kasey McClure picked [REDACTED] and I up  
23 trying to help us. I can't remember which year. She  
24 was from For Sarah.

25 She had called [REDACTED] cell phone and was

1 letting us know that we were -- I can't remember the  
2 words she used. I guess extorted. I don't know what  
3 the word is I'm looking for.

4 Q. I'm sorry, my --

5 A. That's okay.

6 Q. My European friend over here interrupted  
7 me. Kasey McClure came to you and [REDACTED]

8 A. She came to [REDACTED]. She called [REDACTED]  
9 ad.

10 Q. Okay. Off Backpage?

11 A. Yes, I'm assuming.

12 Q. Where do you know that you were advertised?

13 A. Oh, my gosh. There's City Vibe, Madam Fox.

14 Q. Slow down. Slow down.

15 A. Sorry. City Vibe, Madam Fox, Plenty of  
16 Fish, City Vibe, Backpage, Creative Loafing, Craig's  
17 List, everywhere.

18 Q. Okay. So Kasey McClure calls [REDACTED] or  
19 responds to one of her ads, and somehow you met Kasey  
20 McClure?

21 A. With [REDACTED], yes.

22 Q. Where?

23 A. In the parking lot where the old Days Inn  
24 used to be on Northside Drive, in the parking lot of  
25 the Waffle House next to Diamonds of Atlanta, the

1 strip club. They knocked down the Days Inn.

2 Q. Right. Were you working out of that Days  
3 Inn?

4 A. Yes.

5 Q. Okay. So that's another hotel? Was that  
6 on that list?

7 A. The same owner owns Cheshire Motor Inn.

8 Q. Okay. Were you working out of that one  
9 too?

10 A. Yes.

11 Q. Okay. That's the one with the colonnade  
12 with the restaurant in the front?

13 A. Yeah.

14 Q. Okay. Was that owner involved?

15 A. I can't remember.

16 Q. Other hotels that you were at, did they  
17 have employees that did the same things that you've  
18 talked about happening at the two Red Roofs?

19 A. Some of them, yes, but it's hard to keep  
20 track of all of them. There's so many hotels.

21 Q. How do you recall -- how do you recall the  
22 Red Roof so well?

23 A. Because we were there the most. Those were  
24 the hotels that we frequented the most. We had the  
25 best deals going on with the rooms and everything.

1 Q. What does that mean?

2 A. Lowest rates. It was cheaper for us to  
3 stay there. It was just -- for us, it was seen as  
4 being safer because we always got -- we were notified.

5 When police got on the property most of the  
6 time, we were informed somehow. Just some of the  
7 places are different than others.

8 Q. So let me make sure I have this right, and  
9 we're getting close to -- I understand you're getting  
10 tired. Let me make sure I've got this right.

11 And I want to make sure that you weren't  
12 just talking in broad generalities, because this is  
13 important.

14 A. Okay.

15 Q. So I'll try to do my best to ask this very  
16 specifically.

17 A. Okay.

18 Q. Are you telling me that when you stayed at  
19 the Red Roof Smyrna, it was standard to be informed by  
20 someone at the front desk or some employee when police  
21 were coming?

22 A. Or if they were already on the property,  
23 yes.

24 Q. Would that happen every time?

25 A. Most of the time. Not every time.

1 Q. Okay. And I'm trying to -- when you say  
2 most of the time, that technically most means 50.1  
3 percent.

4 A. No.

5 Q. When you say most, do you mean 75? 85? 95  
6 percent?

7 A. I can't give a percent. There were so many  
8 people working out of those hotels at a time. I'm  
9 sure it was hard to call us all and let us all know.  
10 I know I'd seen cops out there without  
11 being informed. Most of the time, we were informed.

12 Q. By somebody at the front desk?

13 A. Yes, or one of the staff. Like the  
14 maintenance guy or the cleaning people would tell us.

15 Q. Describe these cleaning people to me. Were  
16 they --

17 A. Hispanic.

18 Q. Hispanic, okay.

19 A. Some were black. Some were Indian. But  
20 that's generally -- I've seen a couple white ladies.

21 Q. Did you ever have any meaningful  
22 interactions with the cleaning staff other than asking  
23 for stuff?

24 A. Yeah. I mean, I would have conversations  
25 with them when they come in the room. That's the only

1 people you really get to talk to because they come  
2 through.

3 Q. And what would you say?

4 A. Just, "Hey, how are you?" Just something  
5 normal. Anything that could be a distraction from  
6 what was going on.

7 Q. Did any of them tell you, "Hey, I know  
8 what's going on"?

9 A. You didn't talk about what was going on.

10 Q. I'm asking, did any of them tell you?

11 A. They did not speak about it. You don't  
12 speak about it. They knew. They knew we would get in  
13 trouble.

14 Q. How do you know they knew that?

15 A. Because I know they've witnessed it. I  
16 know they've witnessed fights and arguing before,  
17 especially between [REDACTED] and I.

18 Q. Who?

19 A. Hotel staff and cleaning staff.

20 Q. I need some more than that. I need you --

21 A. I know Forrest has seen it. I know the  
22 maintenance guy. I know the --

23 Q. Is that the black maintenance guy that you  
24 were talking about, the cop-type maintenance guy?

25 A. I think his name was T or something like



1 that, yes.

2 Q. Okay. So let's take out Forrest and T,  
3 because you've told me about them. Who else do you  
4 know -- do you know saw stuff?

5 A. The cleaning crew.

6 Q. What did they see?

7 A. They'd see me getting hit. They'd see me  
8 getting yelled at.

9 Q. When would they see you getting hit?

10 A. If we would get into an argument or if I  
11 did something wrong or if I looked at them in the face  
12 past their chin. We weren't allowed to look past the  
13 chin.

14 Q. You just told me that the majority of the  
15 time, the violence went on in the room. And then you  
16 listed out the people that you could recall hitting  
17 you in public at the Red Roof.

18 And I specifically asked you, did anybody  
19 with the hotel see? And you said, I don't know one  
20 way or the other. Now are you changing that?

21 A. I can say that, yes, they have seen me, but  
22 I can't tell you who at which time and when. I don't  
23 know what's all around me at all times.

24 But I have seen them out in the parking lot  
25 when it's happened.

1 Q. What about Brunswick?

2 A. I don't know.

3 Q. How long did you stay at these hospitals?

4 A. No more than the 48 hours.

5 Q. Why?

6 A. Because we were 1013, and we would leave or  
7 get picked up, as you said. We would get picked up  
8 and left.

9 Q. And you'd go back to the life?

10 A. Yes.

11 Q. And go back to using drugs?

12 A. Yes.

13 Q. How much -- how much heroin were you using  
14 a day?

15 A. I don't know, because I wasn't in charge of  
16 the money. We were just given drugs, bags at times.  
17 I don't know how much was in there.

18 Q. Did you inject yourself?

19 A. Yes.

20 Q. How much were you injecting into your body?

21 A. I can't tell you. I didn't have a scale to  
22 weigh it out to tell you every time how much I was  
23 injecting. Water volume is not the same as quantity  
24 of dope, so I cannot tell you.

25 Q. Were you filling the syringe up every time?

## REPORTER'S CERTIFICATION

STATE OF TENNESSEE           )  
COUNTY OF GREENE           )

I, Terry L. Kozakevich, LCR #394, Licensed Court Reporter, Registered Professional Reporter, (and Notary Public), in and for the State of Tennessee, do hereby certify that the above deposition was reported by me and that the foregoing 288 pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number and expiration date following my name below.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 22nd day of June, 2022.



Terry L. Kozakevich, LCR #394  
Registered Professional Reporter  
Expiration Date 9/30/2023  
Notary Public Commission Expires 8/29/22